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6 Counsel for MOHAMED POONJA,
Trustee in Bankruptcy
7

8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 In re
12 SEEQPOD, INC.,
13 Debtor.

Case No. 09-52226 RLE
Chapter 7
Honorable Roger L. Efremsky

**DECLARATION OF BARRY MILGROM
IN SUPPORT OF MOTION FOR ORDER
AUTHORIZING THE TRUSTEE TO SELL
ASSETS FREE AND CLEAR OF CLAIMS,
LIENS AND INTERESTS, INCLUDING
CLAIMS OF SUCCESSOR LIABILITY,
AND TO PAY BREAK-UP FEE**

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18 Date: August 25, 2010
Time: 10:30 a.m.
19 Place: 280 South First Street
Courtroom 3099
20 San Jose, CA 95113

21 I, Barry Milgrom, declare:

22 1. I am an attorney at law, duly admitted to practice before the bar of this Court and a
23 partner of Luce, Forward, Hamilton & Scripps LLP ("Luce"), counsel for Mohamed Poonja,
24 Chapter 7 Trustee in Bankruptcy herein.

25 2. On behalf of the Trustee, I caused to be performed a UCC lien and judgment
26 search. A true copy of the search results is attached hereto as Exhibit A. The only lien shown by
27 the search is one in favor of a former law firm of the Debtor, Knobbe, Martens, Olson & Bear LLP
28 ("Knobbe Firm"), which was recorded with the Delaware Secretary of State on or about December

1 16, 2008 ("Knobbe Lien"). I contacted the Knobbe Firm and was informed that the lien secures a
2 debt in the approximate amount of \$23,000.

3 3. I am informed and believe that counsel for the various Warner Brothers plaintiffs
4 agreed to accept service of the Motion on behalf of the various Warner Brothers plaintiffs.

5 I declare under penalty of perjury under the law of the United States of America that the
6 foregoing is true and correct and if called as a witness I could competently testify thereto, and as
7 to those matters stated on information and belief, I am informed and believe them to be true.

8 Executed this 7th day of July 2010, at San Francisco, California.

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12 BARRY MILGROM
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EXHIBIT A

Delaware

PAGE 1

The First State

CERTIFICATE

SEARCHED MAY 18, 2009, AT 2:23 P.M.
FOR DEBTOR "SEEQPOD, INC"

1 OF 1 FINANCING STATEMENT 84180996
EXPIRATION DATE: DECEMBER 16, 2013
DEBTOR: SEEQPOD, INC.
6475 CHRISTIE AVE., SUITE 475
EMERYVILLE CA 94608 ADDED 12-16-08
SECURED: KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 MAIN STREET, 14TH FLOOR
IRVINE CA 92614 ADDED 12-16-08
F I L I N G H I S T O R Y
84180996 FILED 12-16-08 AT 6:25 P.M. FINANCING STATEMENT
E N D O F F I L I N G H I S T O R Y

THE UNDERSIGNED FILING OFFICER HEREBY CERTIFIES THAT THE
ABOVE LISTING IS A RECORD OF ALL PRESENTLY EFFECTIVE FINANCING
STATEMENTS, LAPSED FINANCING STATEMENTS, FEDERAL TAX LIENS AND
UTILITY SECURITY INSTRUMENTS FILED IN THIS OFFICE WHICH NAME THE
ABOVE DEBTOR, AS OF MAY 7, 2009 AT 11:59 P.M.



20091570438UCXL
090487484


Jeffrey W. Bullock, Secretary of State

AUTHENTICATION: 7307930

DATE: 05-18-09

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS (front and back) CAREFULLY

A. NAME & PHONE OF CONTACT AT FILER (optional)	
Stephen Ybarra	9497600404
B. SEND ACKNOWLEDGMENT TO: (Name and Address)	
KNOBBE, MARTENS, OLSON & BEAR, LLP	
2040 MAIN STREET	
14TH FLOOR	
IRVINE CA 92614	

DELAWARE DEPARTMENT OF STATE
U.C.C. FILING SECTION
FILED 06:25 PM 12/16/2008
INITIAL FILING # 2008 4180996

SRV: 081202418

1. DEBTOR'S EXACT FULL LEGAL NAME - insert only one debtor name (1a or 1b) - do not abbreviate or combine names

1a. ORGANIZATION'S NAME SEQPOD, INC.				
OR				
1b. INDIVIDUAL'S LAST NAME		FIRST NAME	MIDDLE NAME	SUFFIX
1c. MAILING ADDRESS 6475 CHRISTIE AVE., SUITE 475		CITY EMERYVILLE	STATE CA	POSTAL CODE 94608
				COUNTRY US
1e. TYPE OF ORGANIZATION CORPORATION		1f. JURISDICTION OF ORGANIZATION DE		

2. ADDITIONAL DEBTOR'S EXACT FULL LEGAL NAME - insert only one debtor name (2a or 2b) - do not abbreviate or combine names

2a. ORGANIZATION'S NAME				
OR				
2b. INDIVIDUAL'S LAST NAME		FIRST NAME	MIDDLE NAME	SUFFIX
2c. MAILING ADDRESS		CITY	STATE	POSTAL CODE
				COUNTRY
2e. TYPE OF ORGANIZATION		2f. JURISDICTION OF ORGANIZATION		

3. SECURED PARTY'S NAME (or NAME of TOTAL ASSIGNEE of ASSIGNOR S/P) - insert only one secured party name (3a or 3b)

3a. ORGANIZATION'S NAME KNOBBE, MARTENS, OLSON, & BEAR, LLP				
OR				
3b. INDIVIDUAL'S LAST NAME		FIRST NAME	MIDDLE NAME	SUFFIX
3c. MAILING ADDRESS 2040 MAIN STREET, 14TH FLOOR		CITY IRVINE	STATE CA	POSTAL CODE 92614
				COUNTRY US

4. This FINANCING STATEMENT covers the following collateral:
Collateral Description - please see attachment

10. Miscellaneous: SEQPO

6. This FINANCING STATEMENT is to be filed (or recorded) in the REAL ESTATE RECORDS. Attach Addendum [if applicable]		7. Check to REQUEST SEARCH REPORT(S) on Debtor(s) (ADDITIONAL FEE) [optional]		<input type="checkbox"/> All Debtors	<input type="checkbox"/> Debtor 1	<input type="checkbox"/> Debtor 2
8. OPTIONAL FILER REFERENCE DATA SEQPO						

All of debtor's intellectual property that is or has ever been the subject of secured party's representation and all files and records relating thereto, any recoveries from litigation involving such intellectual property, including, without limitation, any judgments, amounts paid in settlement, insurance proceeds and any awards of attorneys' fees and costs, and other proceeds of such intellectual property, including, but not limited to, the property described below.

U.S. Patent Applications

Title of Invention	Application Number
SYSTEM AND METHOD FOR SUMMARIZING SEARCH RESULTS	11/927346
MATCHING AND RECOMMENDING RELEVANT VIDEOS AND MEDIA TO INDIVIDUAL SEARCH ENGINE RESULTS	11/936738
DISCOVERING AND SCORING RELEATIONSHIPS EXTRACTED FROM HUMAN GENERATED LISTS	12/062421
MEDIA DISCOVERY AND PLAYLIST GENERATION	12/147249

Patent Cooperation Treaty Applications

Title of Invention	Application Number
SYSTEM AND METHOD FOR SUMMARIZING SEARCH RESULTS	PCT/US2007/082892
MATCHING AND RECOMMENDING RELEVANT VIDEOS AND MEDIA TO INDIVIDUAL SEARCH ENGINE RESULTS	PCT/2007/083992
DISCOVERING AND SCORING RELEATIONSHIPS EXTRACTED FROM HUMAN GENERATED LISTS	PCT/US2008/059308
MEDIA DISCOVERY AND PLAYLIST GENERATION	PCT/US2008/068401

All of debtor's intellectual property that is or has ever been the subject of secured party's representation and all files and records relating thereto, any recoveries from litigation involving such intellectual property, including, without limitation, any judgments, amounts paid in settlement, insurance proceeds and any awards of attorneys' fees and costs, and other proceeds of such intellectual property, including, but not limited to, the property described below.

U.S. Trademark Applications

Trademark Name	Application Number
PLAYABLE SEARCH	77/248060
MUSIC HERE & NOW	77/252561
SEARCH BEYOND WORDS	77/252566
SEEQPOD	77/252569
SEEQ HANG OUT	77/252573
SEEQGEIST	77/279816
MERCHPOD	77/351743
PLAYABLE SEARCH	77/351786
MUSIC HERE & NOW	77/351792
SEARCH BEYOND WORDS	77/352086
SEEQPOD	77/351800
SEEQ HANG OUT	77/352089
SEEQGEIST	77/352090
HOLLAWALLA	77/415231